

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**In re: City of Woonsocket Water Division's
Application to Implement Second Step Rate Change
under Multi-Year Rate Plan**

Docket No. 4879

**CITY OF WOONSOCKET WATER DIVISION'S ("WWD")
RESPONSES TO PUBLIC UTILITIES COMMISSION'S
FIFTH SET OF DATA REQUESTS (Step 2)
(Issued May 19, 2020)**

PUC 5-1	When were each of the Woonsocket Water's employees transferred to the vendor?
WWD Response 5-1:	December 31, 2018
Respondent:	David G Bebyn CPA and Jonathan Pratt, City Engineer
Date:	May 22, 2020

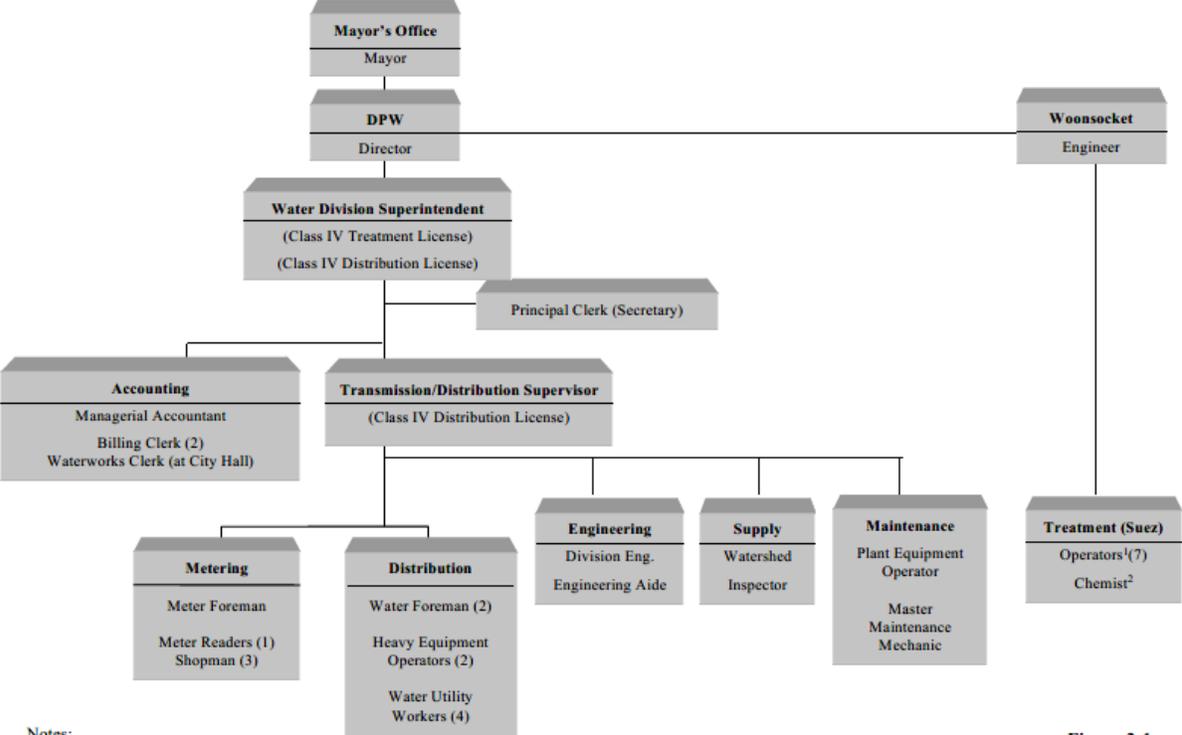
PUC 5-2	What is the name of the employee holding the position of Plant Master Maintenance Mechanic? How long has this individual held this position?
WWD Response 5-2:	Kerry Fadgen. He has held the position since October of 2015.
Respondent:	David G. Bebyn CPA and Marc Viggiani, Water Division Superintendent
Date:	May 22, 2020

PUC 5-3	Is the position of Plant Master Maintenance Mechanic a member of a bargaining unit? If so, which one?
WWD Response 5-3:	Yes, Local 670 of RI Council 94, AFSCME, AFL-CIO
Respondent:	David G. Bebyn CPA and Jonathan Pratt, City Engineer
Date:	May 22, 2020

PUC 5-4	To whom does the Plant Master Maintenance Mechanic report? Please provide the name and title of supervisor, as of May 2019 and now.
WWD Response 5-4:	Marc Viggiani, Water Division Superintendent
Respondent:	David G. Bebyn CPA and Jonathan Pratt, City Engineer
Date:	May 22, 2020

PUC 5-5	Does the Plant Master Maintenance Mechanic have an employment agreement with the Woonsocket Water Department? If so, please provide a copy of the same.
WWD Response 5-5:	No, the position is covered by the union contract.
Respondent:	David G. Bebyn CPA and Jonathan Pratt, City Engineer
Date:	May 22, 2020

PUC 5-6	Please provide a copy of the current organizational chart of the Woonsocket Water Department.
WWD Response 5-6:	



Notes:
 1) Class III Treatment License
 2) Class IV Treatment License

Figure 2-1
 City of Woonsocket, Rhode Island
 Water Distribution System Evaluation
 Water Division Organization

Respondent:	David G. Bebyn CPA and Marc Viggiani, Water Division Superintendent
Date:	May 22, 2020

PUC 5-7	Referring to PUC 4-2, Attachment, page 5. This document indicates six Water Treatment Plant Operators by name, who were eligible to apply for employment with the vendor. At the time that document was executed, two positions were vacant. Were these positions ever filled after 2016? If so, what were the names of the employees who transferred to the vendor?
WWD Response 5-7:	Yes. The two vacant positions and any interim vacancies were filled by May 2018. John Palardy and Mike DiIorio are the names of the employees who filled the vacancies and were transferred to the vendor.
Respondent:	David G. Bebyn CPA and Marc Viggiani, Water Division Superintendent
Date:	May 22, 2020

PUC 5-8	Please provide a clear and concise explanation of the process utilized to determine which positions would be transferred to the vendor and which would stay with Woonsocket Water.
WWD Response 5-8:	The first step in the whole process was to address the labor memoranda of agreement with regard to any transfer of employees. The City, along with its legal counsel for labor issues, was involved with the negotiations and the final agreement, which is attached to the response to Commission 4-2. These documents were finalized early in 2016. These memoranda of agreement detailed the positions that would have to be transferred to the vendor. The vendor would also need a mechanic position which they did offer to the Plant Master Maintenance Mechanic, however this position was not one of the positions required to be transferred in the memoranda of agreement.
Respondent:	David G. Bebyn CPA
Date:	May 22, 2020

PUC 5-9	Who at Woonsocket Water (or the City of Woonsocket) had final authority in selecting which positions would move to the vendor and which positions would stay with Woonsocket Water?
WWD Response 5-9:	Steven P. D'Agostino, Director of Public Works
Respondent:	David G. Bebyn CPA and Jonathan Pratt, City Engineer
Date:	May 22, 2020

PUC 5-10	At what point did Woonsocket Water realize that the Plant Master Maintenance Mechanic’s inclusion in the list of transferred positions in the rate case was erroneous? Who discovered this? When this error was discovered, what efforts, if any, did Woonsocket Water take to notify the Division and Commission?
WWD Response 5-10:	<p>The discovery that the Plant Master Maintenance Mechanic inclusion in the list of transferred positions in the rate case was erroneous was made by myself during the preparation of this compliance filing. One of the items I requested as part of my review was a breakdown of labor costs for Calendar year 2019 by employee. I noted from this worksheet that the Plant Master Maintenance Mechanic had a full year of pay. I asked management the reason for the position not being transferred and was informed by Mr. Viggiani, Water Division Superintendent, that the position had an integral part in the distribution system.</p> <p>Mr. Viggiani informed me that this maintenance position covered the storage tanks, pump stations, and 3 high hazard dams which were staying with the city’s operations. Mr. Viggiani also did not want to lose the knowledge of keeping the Distribution system in operation that this employee possessed. The alternative would have been to train persons with no knowledge of system operations which could cause major disaster in the event of an emergency. Furthermore, it takes a few years before Mr. Viggiani would feel comfortable with a person making emergency decisions on the distribution system.</p> <p>Regarding notifying the Division and Commission since this was discovered during the filing of the compliance filing, we informed both as part of this filing.</p>
Respondent:	David G. Bebyn CPA and Marc Viggiani, Water Division Superintendent
Date:	May 22, 2020

CITY OF WOONSOCKET, WATER
DIVISION
By its Attorneys,

/s/ Alan M. Shoer
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Dated: May 22, 2020

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2020 I delivered a true copy of the foregoing responses of the **City of Woonsocket Water Division in response to the Public Utilities Commission's (Step 2) Fifth Set of Data Requests** via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer